

Spectrum Policy Task Force Review (6/1/04)

Few electronic standards remain from the post WWII era (1940s) and yet no changes have been made to the FM radio spectrum since that time. While I applaud the efforts to update the frequency by allowing two digital channels per frequency, I propose that to fully enable radio broadcasters to keep pace with all the challenges facing them today including 160 channels from satellite radio and virtually unlimited choices via Internet radio that you expand the FM spectrum after Channel 6 vacates the analog portion of its spectrum to allow more opportunities in the FM band. I say this for several reasons:

1. There was never any proper buffer placed between Channel 6 and the low end of the FM spectrum which had a very detrimental effect on non-commercial radio stations where there was a Channel 6. For example, WBST, Muncie would have been a Class-B, 50,000-watt station without the TV interference of WRTV, Indianapolis making us reduce our power in 1979. It is imperative that the FCC build in a buffer between FM and whatever gets placed in the analog 6 spot.
2. The FCC could resolve all problems with Low Power FM (LPFM) and full-power radio stations if you gave them a portion of the spectrum for their very own.
3. With all the competition I now face, my one channel begins to lose the public service battle when placed against forces with over 150 channels to choose from...150 to 1 is a bad ratio. Radio was the original mass electronic media communicator and it's losing the battle against din of so many other choices. Please give me more physical band capacity so that I may offer other radio services to help sustain my relevance before AM & FM become obsolete.

This is an opportunity for the FCC to help FM radio maintain its place in the media pantheon that would expand capacity of existing stations, allow for growth of minority markets, and still allow all radios to be able to gather some radio signal while the conversion occurs. No break in the frequencies needs to occur. I believe no less than a doubling of the FM spectrum will help FM maintain its relevance...say 70-106 MHz with an expanded public service (non-commercial) section 84-92 MHz and a section reserved completely for LPFM from say 70-76 MHz.

Please seriously consider this request. The students in the college level "Media Analysis & Criticism" class I teach tell me that they have already given up on listening to the radio because it no longer serves their purpose. That's my future audience. If they've gotten out of the habit of listening to the radio entirely because the commercial stations are not providing them something they are interested in, then I will have great difficulty pulling them back to the spectrum. If that happens, then as a public radio broadcaster, I'm losing my ability to provide great public service.